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10 United States of America

11 IN THE UNITED STATES DISTRICT COURT  
12  
13 EASTERN DISTRICT OF CALIFORNIA

14  
15 UNITED STATES OF AMERICA,  
16 Plaintiff,  
17 v.  
18 QUINTIN JEUH CARLOS-BANUELOS,  
19 Defendant.

20 CASE NO. 1:20-CR-00175-NODJ-BAM

21 STIPULATION TO VACATE TRIAL  
22 CONFIRMATION HEARING AND TRIAL AS TO  
23 QUINTIN JEUH CARLOS-BANUELOS AND SET  
24 CASE FOR CHANGE OF PLEA AND ORDER  
THEREON

25  
26  
27  
28 **STIPULATION**

29 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
30 through defendant's counsel of record, hereby stipulate as follows:

31 1. By previous order, this matter was set for a trial confirmation hearing on April 29, 2024,  
32 and a trial on May 14, 2024.

33 2. By this stipulation, defendant now moves to vacate the trial confirmation hearing and trial  
34 as to QUINTIN JEUH CARLOS-BANUELOS and to set the case for a change of plea hearing on  
35 March 18, 2024 at 9:00 a.m. The proposed change of plea date represents the earliest date that all  
36 counsel are available, taking into account counsels' schedules, defense counsels' commitments to other  
37 clients, and the court's available dates for a change of plea hearing.

38 3. The parties agree and stipulate, and request that the Court find the following:

39 a) The discovery associated with this case includes case includes voluminous  
40 investigative reports, wire interceptions recordings and electronic messages, precise location  
41 information data, and cellular phone downloads, totaling thousands of pages of discovery and

1 several gigabytes of electronic data.

2 b) Defense counsel requests the additional time to prepare for the change of plea  
3 hearing, meet with his client, and review/negotiate the plea agreement.

4 c) Counsel for the defendant believes that failure to grant the above-requested  
5 continuance would deny him the reasonable time necessary for effective preparation, taking into  
6 account the exercise of due diligence.

7 d) The government does not object to the continuance.

8 e) Time has already been excluded beyond the proposed change of plea hearing date.

9 IT IS SO STIPULATED.

10 Dated: January 25, 2024

PHILLIP A. TALBERT  
United States Attorney

12 By: /s/ JUSTIN J. GILIO  
13 JUSTIN J. GILIO  
14 Assistant United States Attorney

15 Dated: January 25, 2024

/s/ Victor Chavez  
16 Attorney for Defendant  
17 QUINTIN JEUH CARLOS-BANUELOS

18 **ORDER**

19 IT IS SO ORDERED that the jury trial set for May 14, 2024, and trial confirmation set for April  
20 29, 2024 are vacated as to QUINTIN JEUH CARLOS-BANUELOS. A change of plea hearing is set for  
21 **March 18, 2024, at 8:30 a.m. in Courtroom 5 before the District Court Judge.** Time was previously  
22 excluded through May 14, 2024.

23 IT IS SO ORDERED.

24 Dated: January 25, 2024

/s/ Barbara A. McAuliffe

25 UNITED STATES MAGISTRATE JUDGE